

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
ADLER GROUP INC
EIN #66-0795067
Debtors

CASE #17-02727 MCF
CHAPTER 11

CLAIMANT's RESPONSE & OPPOSITION TO OBJECTION TO
CLAIMS #12, #13 & #14

TO THE HONORABLE COURT:

COMES NOW, claimant ERIC ALVAREZ MELENDEZ at claims #12, #13 & #14 represented by the undersigned attorney and who respectfully prays as follows:

1. On January 11, 2018 at doc #76 debtor has objected claims #12-1, #13 & #14-1 in an *Omnibus Objection to Claim Based on Lack of Supporting Information Required by R 3001(b) of the Federal Rules of Bankruptcy Procedure* that should be responded to on or before February 16, 2018.
2. This claimant requested and was granted 2 extensions of time to additionally support its claims in that of payment(s) made by claimant or on his behalf for payrolls and other costs and expenses paid by him on behalf of debtor and other alter egos and/or successor corporations that debtor has been known, incorporated and operated during the last 5 years or more, being all the same entity and persons.
3. It is continued to be difficult for claimant to gather and organize the evidence for all the items claimed that are not contingent, due to the continued difficulties produced in claimant's records, office and home post Hurricanes Irma and Maria. Claimant's attorney has just last evening recovered part of her computer systems, but not all her office is operating to full strength, as in many offices and businesses after the two back to back hurricanes in Puerto Rico. We continue without copier or scanners connected our computer system and our Server has yet to be reconnected after a huge recovery effort due to mold produced by the Hurricanes.
4. The undersigned also has to travel tomorrow to Denver, Colorado to the Nacba Convention where she has the privilege of participating in a panel on bankruptcy at the Convention and will be away from her office for an entire week.

5. We note that all of the objections to claims by this debtor allege virtually the same basis for objection, allegedly that “does not meet the standard to constitute prima facie evidence of its validity or extent of any alleged claim or amount purportedly owed.” Or, as the objection pertains to claim #13-1 [sic] that “the P.O.C. contains no evidence of support of the claim, i.e., contract or agreement authorizing the charges and the fees included in the claim and evidencing the basis of the purported claim”
6. The claims are all owed and the majority of amounts claimed were payments made by claimant on behalf of debtor in what was never in the ‘ordinary course of debtor’s operations’ which were by far never in the true sense ‘ordinary course of business practices’ for the operation of a school or any serious endeavor, requiring claimant’s financial assistance almost always on an *impromptu* or emergency basis and paid or covered with the [false] representation by the debtor that claimant would be reimbursed and re-paid the amounts advanced out of his pocket.
7. Claimant supports its claim with the verified certification attached to the claims and today attaches what supporting evidence has been recovered as of this date, with the effort continuing until a hearing on this matter is scheduled, with the hope that before any hearing on this matter more evidence can be supplemented to this response.
8. We personally anticipated to debtor’s counsel last week that the collection of additional supporting evidence has been increasingly difficult under the circumstances.
9. Claimant will further support his non-contingent claims and payment by him and the terms that were generally given verbally by debtor for repayment at a hearing on this matter.

WHEREFORE claimant in claims #12, #13 and #14, ERIC ALVAREZ MELENDEZ respectfully prays that the attached evidence be accepted as claimant’s support for the actual payments and expenses paid for by Claimant or persons on his behalf for the benefit of this debtor and/or its alter egos and entities or names under which debtor has operated under for the last years.

I HEREBY CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF Filing System which will send a notification, upon information and belief, of such filing to the U.S. Trustee and to all subscribed users.

In Caguas, Puerto Rico, this April 16, 2018.

s/LA Morales

USDC PR #120011

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